

Drinking Water Advisory Work Group



Lessons Learned from Level 1
Assessments under the RTCR

Austin, Texas
October 25, 2017

Jennelle Crane

Level 1 Assessment (What Is It?)



- **Level 1 Assessment** - an evaluation to identify the possible presence of sanitary defects, defects in the distribution system coliform monitoring practices and (when possible) the likely reason that the PWS triggered the assessment.
- **Sanitary Defects** – A defect that could provide a pathway of entry for microbial contamination into the distribution system or that is indicative of a failure or imminent failure in a barrier that is already in place.

Level 1 Assessment

(When Do I Have To Conduct One?)



- If the PWS collects 40 or more distribution samples per month
 - More than 5% samples collected in a month are total coliform positive
- If the PWS collects fewer than 40 distribution samples per month
 - When two or more samples collected in a month are total coliform positive
- When a PWS fails to collect the required number of repeats

General Form Information



- Sign Form
- Attach Required Documentation
 - Sample Site Collection SOP
- Disinfection Records
- Read Entire Question
- Answer Each Question
 - Answer N/A if Appropriate

Please note that No. 1 and 2 below are required attachments.

Attached

1. Coliform sample collection Standard Operating Procedure (SOP), as referenced in Section 2.

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2. One month of disinfection residual data prior to the assessment trigger date.

☐

3. **(Optional)** Attach any additional documentation pertinent to the assessment event.

☐

Describe:

Sanitary Defects



- PWSs do not receive a violation if they note a Sanitary Defect
- PWSs will receive a violation if they do not correct the Sanitary Defect within the established timeframe.
- If a Sanitary Defect is noted but not corrected by the time the Level 1 is due - please make sure you provide a projected date that the sanitary defect will be corrected.
- Any time you note that a Sanitary Defect is corrected you will need to supply documentation.

Section No.	Sanitary Defect (SD) and associated Corrective Action (CA)			
1				
SD	2			
CA	3			
	CA Completed?	Yes <input type="checkbox"/>	No <input type="checkbox"/>	4
	If "No", please indicate Proposed Compliance Deadline			5

6 Attach Documentation (if needed)

Sanitary Defects (Continued)

Examples



- Chlorinator Broken
 - Documentation – Purchase order or photo of new chlorinator installed
- Water Leak in area of sample
 - Documentation – Maintenance/service order noting the leak was fixed in accordance with AWWA standards and potentially an update to sample collection SOP to survey area for leaks
- Well casing hole and leak on well discharge pipe
 - Documentation – Maintenance/service order noting the repairs made along with photos of repairs

Sanitary Defects (Continued)

NOT Sanitary Defects



- Sampler Error (not washing hands, using same cooler for water and wastewater samples, etc.)
- Incorrect Sample bottles

Difference between SSP, MP and Sample Collection SOP



- **RTCR Sample Siting Plan** – Document where and when you collect bacteriological samples
- **Monitoring Plan** – Documents where ALL compliance samples are collected and where they are analyzed
- **Sample Collection Standard Operating Procedure** – documents how bacteriological samples are to be taken for your specific water system.
 - Do you flame or bleach, Wash hands, Don't rinse bottle, Etc.

Level 1 Questions and Contacts



- Questions????
- Contacts
 - Jennelle Crane - 512-239-6118 – Jennelle.crane@tceq.texas.gov
 - Jasmine Oliveira - 512-239-6141 – Jasmine.Oliveira@tceq.texas.gov
 - Jacolyn Saldana - 512-239-4445 – Jacolyn.saldana@tceq.texas.gov

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Lessons Learned from Level 2
Assessments (L2As) under the
RTCR

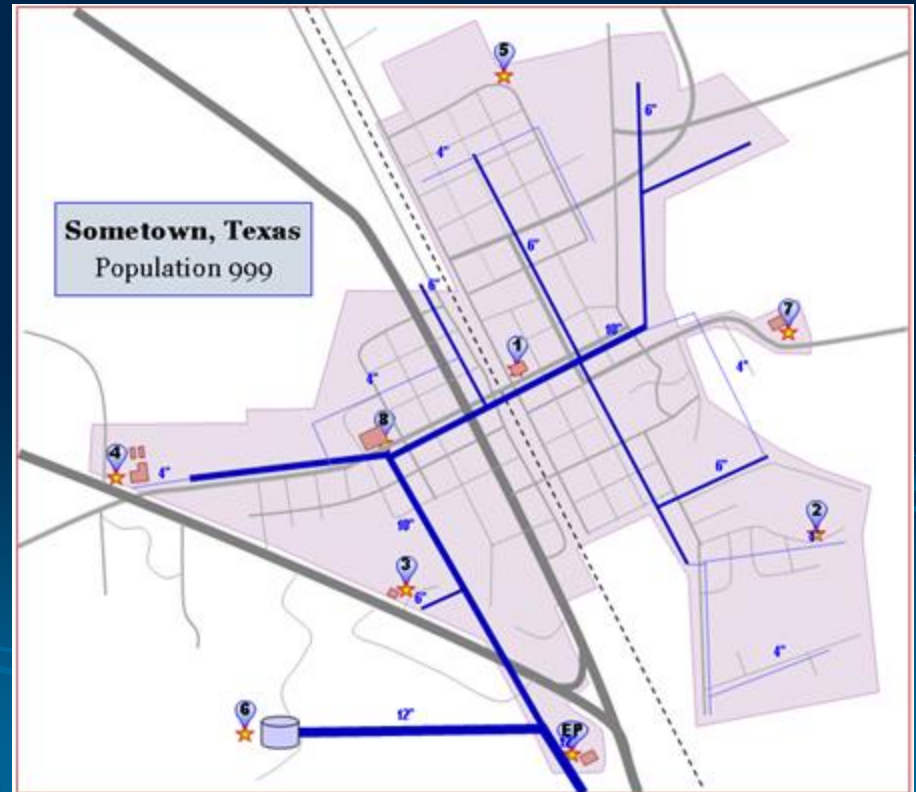
Austin, Texas
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David Simons, P.E.

Gaps in Understanding



- Revised Total Coliform Rule (RTCR) requirements are complex
 - PWSs that trigger L2As often need help understanding the RTCR
 - Coliform Sample Siting Plans (SSPs)
 - Also NAPs and Monitoring Plan



Sanitary Defects



Examples of Sanitary Defects



- Sampler Error
- Other

- “Other” examples
 - Poor coliform sample sites
 - Failed chlorinator on TC+ well
 - Improper sanitary precautions
- “Sampler error” is uncommon!

L2A Assessor Training



- Interim training process for L2A assessors
 - TCEQ provides on-site training to a PWS's appointed L2A assessor
 - Essentially a 1-day, crash course in how to conduct an L2A
 - Review all questions in the L2A Form
 - As time allows, visit PWS's coliform sample sites and facilities

L2A Assessor Training



- Interim training process results
 - PWS L2A submittals – demonstrate that inexperienced L2A assessors cannot be adequately trained in one day
 - TCEQ's onsite assistance – allows the L2A submittals to be revised by TCEQ
- Important implications for future requirements for L2A assessors (still under development)

PWS Facilities



- TCEQ's Inventory of Facilities
 - Initial inventory and updates are often not reported correctly to TCEQ
 - Discrepancies between what needs to be assessed and what is in existing sampling plans.
 - L2As provide opportunities to clean up Inventory



Level 2 Questions



Drinking Water Advisory Work Group



RTCR Invalidations

Austin, Texas

October 25, 2017

Gary Regner